

Grundsatzklärung über Menschenrechtsstrategie

Version 1.0, Gültig ab 20. Dezember 2024

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Human Rights Policy Statement

Version 1.0, Effective from 20 December 2024

I. Scope of Application and Overall Responsibility

Contemporary Amperex Technology Co., Ltd. (hereinafter referred to as "CATL") companies established in Germany, including but not limited to: **Contemporary Amperex Technology Thuringia AG, CATL Operation Service Thuringia GmbH & Co. KG, CATL Thuringia Trust GmbH**, and all future companies to be established in which these companies directly or indirectly hold at least 50% of the shares (hereinafter referred to as "CATL Germany" or "we").

II. Our Commitment

We hereby issue this "Human Rights Policy Statement", which has been approved by the management of CATL Germany, to express our commitment to fulfilling the obligations of the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz, hereinafter referred to as "**LkSG**"). This includes actively identifying, preventing, and mitigating human rights and environmental risks within our supply chain, as well as addressing and rectifying any violations of human rights or environmental obligations that may arise. We are committed to implementing appropriate measures and continuous monitoring to ensure compliance with the LkSG and to promote sustainable and ethical practices throughout our operations.

Therefore, we review this statement annually and ad hoc based on the principles of continuous improvement and further development, and initiate updates when changes in human rights-related situations are observed. For us, respecting human rights and protecting the environment is an ongoing commitment, and we are continuing to develop it into a more complete human rights and environmental risk management system based on changing environmental conditions, types of business activities, and corporate size and structure. At present, we have developed and issued the "**LkSG Employee Behavior Guidelines**" and "**LkSG Supplier Code of Conduct**"(hereinafter "**CSCC**") to ensure the establishment of a unified human rights and environmental risk management mechanism in our own business areas and supply chain management areas, and implement appropriate due diligence procedures based on the results of supply chain risk identification and assessment.

We are committed to achieving sustainable use of resources, preventing or minimizing the generation of pollutants, ensuring the prevention of pollution throughout the entire process of product development, production, sales, use, and disposal, and reducing the negative impact of the environment on respect for human rights.

We assist employees and suppliers in identifying the impact of production activities on human rights and environmental risks by providing necessary training, and encourage them to make the same commitment.

We are committed to complying with the relevant requirements of LkSG, respecting human rights and complying with relevant environmental standards in our own business areas and supply chains. Including:

2. 1. Respect for human rights and working conditions:

- Prohibition of child labor and protection of young workers
- Prohibition of forced labor and modern slavery
- Emphasis on workplace health and safety
- Respect for freedom of association and the right to collective bargaining

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- Avoid unequal treatment in employment
 - Prohibition on withholding a living wage
 - Protecting local communities and indigenous peoples
 - Protecting land rights and prohibiting forced evictions
 - Avoid hiring private or public security forces or using security forces without adequate oversight

2. 2. Respect for the Environment:

- Responsibly manage soil, water, air, and noise, and avoid actions that cause harmful soil changes, water pollution, air pollution, harmful noise emissions or excessive water use which may impair the natural bases for food production and preservation, access to drinking water, or sanitary facilities or harm the health of a person;
- Comply with the requirements of the Minamata Convention and avoid illegal production and use of mercury-contaminated products or illegal disposal of mercury wastes
- Comply with the requirements of the Stockholm Convention and avoid illegal production, use, storage and disposal of persistent organic substances
- Comply with the requirements of the Basel Convention and avoid illegal import or export of hazardous wastes and other wastes

III. Reference

We adhere to strict human rights standards, including the following conventions:

- Convention No.29, also known as the Forced Labour Convention (No. 29)
- Protocol to the Convention on Forced Labour
- Convention No.87, also known as the "Freedom of Association and Protection of the Right to Organise Convention,"
- Convention No.98, also known as the Convention on the Right to Organise and Collective Bargaining
- Convention No.100, entitled the Equal Remuneration Convention of the International Labour Organisation (1951)
- Convention No.105 for the Abolition of Forced Labour
- Convention No.111, also known as the ILO Discrimination (Employment and Occupation) Convention of 1958
- Convention No.138, also known as the Minimum Age Convention of 1973
- Convention No.182, also known as the Convention on the Worst Forms of Child Labour
- International Covenant on Civil and Political Rights
- International Covenant on Economic, Social, and Cultural Rights
- Stockholm Convention
- Minamata Convention
- Basel Convention

IV. Employee Behavior Initiatives

As members of CATL Germany, we urge all colleagues to take action to ensure that we consistently uphold human rights and safeguard the environment in our business practices. This particularly includes the following legal rights that are specifically protected under the LkSG:

- Prohibition of child labor and protection of young workers
- Prohibition of forced labor and modern slavery
- Emphasis on workplace health and safety
- Respect for freedom of association and the right to collective bargaining

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- Avoid unequal treatment in employment
 - Prohibition on withholding a fair wage that is at least equivalent to the minimum wage
 - Protecting local communities and indigenous peoples
 - Protecting land rights and prohibiting forced evictions
 - Avoid hiring private or public security forces or using security forces without adequate oversight, as this may lead to violations of human rights protected under the LkSG
 - Avoid actions that cause harmful soil changes, water pollution, air pollution, harmful noise emissions, or excessive water use
 - Violation of the Minamata Convention by illegally producing and using mercury-contaminated products or illegally disposing of mercury waste
 - Violation of the Stockholm Convention by illegal production use, storage, and disposal of persistent organic substances
 - Violation of the Basel Convention by illegally importing or exporting hazardous waste

The above initiative outlines the legal requirements that CATL Germany must adhere to under the LkSG, which impacts the conduct of all CATL Germany employees within the own business area of CATL Germany, in their interactions with business partners, officials, and third parties, emphasising the importance of respecting human rights and environmental protection.

V. Risk Management

We responsibly identify and manage human rights and environmental risks in accordance with the requirements of the LkSG, and actively engage in risk management. Based on our current risk management situation, we progressively set specific targets to reduce the impact of risks and continuously monitor and refine our strategies to ensure effective risk reduction and ongoing attention to risk management.

We have identified human rights and environmental risks and opportunities related to the LkSG and actively respond to them based on our own business nature, internal and external development environment, and expert opinions.

We have established a risk management system in terms of risk analysis, preventive measures, corrective measures, complaint mechanism, documentation, reporting requirements, and effectiveness review. At the same time, we follow up on the results of the effectiveness review every year in order to improve the above risk management system.

Our management reviews applicable laws and regulations on a regular and ad hoc basis to ensure compliance with the requirements of the LkSG and to implement appropriate risk management measures. They also designate the individuals responsible for each action and establish clear timelines for their completion to ensure accountability and effectiveness.

We have established the role of a Human Rights Officer in accordance with the requirements of the LkSG to oversee the effective implementation of our risk management and to report regularly (at least once a year) to CATL Germany management on human rights and environmental risk issues and the performance of due diligence to ensure the adequacy and compliance of the risk management mechanism.

5.1 Risk Analysis

Based on the requirements of the LkSG, we have designed a structured risk identification and assessment plan, which clearly defines the specific risk analysis procedures. In fulfilling our due diligence obligations, we pay particular attention to the potential risks listed in LkSG. We systematically identify and assess relevant human rights issues and potentially affected

populations, and prioritise the identified risks based on criteria such as the expected severity of violations and the likelihood of their occurrence.

The risk analyses are performed once a year as well as on an ad hoc basis, e.g., in the case of changed country risks, reported information from the grievance mechanism, and public reports from authorities and nongovernmental organizations.

As part of the risk analyses, regarding our **own business area**, we examine human rights-related topics that are considered important at our locations. With the involvement of responsible and appropriately qualified employees (risk assessors), specific human rights-related risks are determined for each affected group identified. The results of the risk analysis lead to a plan of measures, the implementation and effectiveness of which are regularly tested.

For **our supply chain**, we identify risks based on procurement or service categories and consider the policies and procedures that suppliers have in place to respect human rights. We have systematically expanded our corporate risk and supplier management to include human rights processes and measures. This enables us to determine the individual risk profile of our direct suppliers. We pay particular attention to suppliers with large purchasing volumes and who have been doing business with CATL Germany continuously for the last three years.

In addition, we will also perform appropriate ad hoc risk analysis if we receive specific information about potential incidents with our indirect suppliers or when we launch new products, new projects, or invest in new business areas.

5.2 Preventive Measure

Based on the results of the risk analysis, we have identified the following risks as our priority human rights and environment-related risks, including:

- Disregard for occupational health and safety
- Disregard for freedom of association and the right to collective bargaining
- Actions that lead to detrimental soil changes, water pollution, air pollution, harmful noise emissions, or excessive water consumption. Such actions may significantly harm the natural foundations necessary for food preservation and production, deny access to clean and safe drinking water, render sanitation facilities ineffective, and harm human health

We evaluate human rights and environmental risks in our own business areas and supply chain, analyze risks through communication with various business departments, formulate risk prevention measures, and promptly identify areas that need improvement, including:

For our **own business areas**, we have developed and published the LkSG Employee Behavior Guideline which complies with the regulations and outlines the LkSG's human rights protection principles in the areas of human rights and the environment, to ensure that CATL Germany establishes unified human rights risk management standards in its own business areas as much as possible. It is one of the important measures to prevent human rights and environmental risks under the LkSG, summarizes the statutory provisions that CATL Germany needs to comply with under the LkSG. This document has been reviewed and approved within the company and issued to each employee for execution. We actively encourage employees to report risk incidents through various channels. In addition, we provide training resources to our employees to increase their awareness of risk management (in the planning process).

For **supply chain**, we have developed the Supplier Code of Conduct (CSCC), which has been communicated to direct suppliers on our Supplier Relationship Management System landing

pages. We are committed to establishing and maintaining a responsible supply chain and have made a commitment to our suppliers to avoid any form of human rights abuses in business operations that violate the requirements of the LkSG.

We expect every supplier to commit to the LkSG Supplier Code of Conduct. This code outlines the human rights and environmental principles required by LkSG to help all suppliers in the supply chain reach consensus on human rights and environmental risk management standards to the extent possible. Furthermore, we are developing a plan to incorporate the CSCC into the contractual agreements we sign with suppliers. This will ensure that our business partners are aware of and adhere to the aforementioned policy. We aim to encourage suppliers to proactively fulfil their responsibility to respect human rights.

5.3 Remedial Action

If we become aware of an imminent or actual violation of the requirements of the LkSG in our own business operations or at our direct or indirect suppliers, we immediately take remedial action to avoid, minimize or eliminate such violations by rectifying our own business operations or communicating and negotiating with the affected suppliers, or even by terminating or reducing our relationship with them.

5.4 Complaint Procedure

In order to comply with the requirements of the LkSG, we provide email and paper letter reporting methods to receive complaints or reports of suspected violations of the LkSG from stakeholders such as the public, employees, partners, customers, suppliers, etc. 24 hours a day. We communicate this to all employees through internal system releases, notice boards, etc. We strictly abide by the whistleblower protection regulations and protect the rights of whistleblowers by implementing standardized protection mechanisms. We implement confidentiality management measures to protect the rights of whistleblowers, including restricting information access channels and designating special personnel to handle reports. You can obtain more detailed information with „Rules of procedure of complaint procedure under LkSG" about the complaint mechanism through the official website (www.catl.com/de).

5.5 Documentation and Reporting

In accordance with the requirements of the LkSG, we submit an annual report to the German Federal Office for Economic Affairs and Export Control ("BAFA") starting from 2025. The report lists the risk management mechanisms, prevention and remedial action, complaint mechanisms we have implemented, and our methods for evaluating the effectiveness of the above mechanisms or measures, as well as the most significant human rights and environmental risks we have identified (if any), and their impact on human rights and environmental risks in our own business areas and supply chain areas (if any). This annual report will also be published and disclosed on our website (www.catl.com/de).

5.6 Effectiveness Review

In accordance with the requirements of the LkSG, we conduct compliance assessments on the adequacy, effectiveness and timeliness of our preventive measures, remedial actions, and the operation of our grievance mechanisms (including human rights and environmental risk management mechanisms in our own business areas and human rights and environmental risk management mechanisms in the supply chain) based on a risk-oriented approach to ensure the appropriateness and effectiveness of our risk management.

人权政策声明

版本 1.0, 自 2024 年 12 月 20 日起生效

一、适用范围及总体责任

宁德时代新能源科技股份有限公司（以下称“宁德时代”）在德国设立的公司，包括但不限于：**德国时代新能源科技（图林根）股份有限公司，宁德时代运营服务（图林根）有限两合公司，宁德时代信托（图林根）有限公司**以及这些公司直接或间接持有至少 50% 股权的所有未来即将成立的公司（以下简称“我们”或“CATL 德国公司”）。

二、我们的承诺

我们特此发布本《人权政策声明》，该声明已获得 CATL 德国公司管理层的批准，旨在表达我们履行《德国供应链尽职调查法》（Lieferkettensorgfaltspflichtengesetz，以下简称“LkSG”）义务的承诺。这包括积极识别、预防和减轻我们自身业务领域和供应链中的人权和环境风险，以及解决和纠正可能出现的任何违反人权或环境义务的行为。我们致力于实施适当措施和持续监控，以确保遵守 LkSG，并在整个运营过程中持续推动可持续性与道德实践。

基于持续改进与进一步发展的理念，我们每年以及在必要时会对本声明进行审视，并在人权状况出现变化时，主动进行更新。对本公司而言，尊重人权和保护环境是一项长期的承诺。我们将根据环境条件、业务活动的性质以及企业规模和结构的变动，持续完善人权与环境风险管理体系。目前，我们已经制定并公开发布了《LkSG 员工行为指南》和《LkSG 供应商行为准则》，以确保在业务运营及供应链管理中建立统一的人权与环境风险管理机制，并依据供应链风险的识别与评估结果，执行相应的尽职调查程序。

我们致力于实现资源的可持续利用，预防或最大程度地减少污染物的产生，确保在产品开发、生产、销售、使用和处置的全过程中预防污染，减少环境因素对人权尊重可能产生的负面影响。

我们致力于通过提供必要的培训，帮助员工和供应商识别生产活动对人权、环境风险的影响，并鼓励他们做出相应的承诺。

我们承诺遵守 LkSG 的相关要求，在自身业务领域及供应链中尊重人权和遵守相关环境标准。具体包括：

2.1. 尊重人权和工作条件：

- 禁止使用童工和保护青年工人
- 禁止强迫劳动和现代奴役
- 重视工作场所的健康和安全
- 尊重结社自由和集体谈判权
- 避免就业方面的不平等待遇
- 禁止扣留生活工资

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- 保护当地社区和土著居民
 - 保护土地权和禁止强迫驱逐
 - 避免雇佣私人或公共安全部队或在没有充分监督的情况下使用安全部队

2.2. 尊重环境：

- 负责任地进行土壤、水、空气和噪声管理，避免造成有害土壤变化、水污染、空气污染、有害噪声排放或者过度用水等可能会损害食品生产和保存的自然基础、饮用水或卫生设施的获取或损害人体健康等行为
- 遵守《水俣公约》要求，避免违规生产和使用受汞污染的产品或非法处理汞废物
- 遵守《斯德哥尔摩公约》要求，避免违规生产、使用、储存和处置持久性有机物质
- 遵守《巴塞尔公约》要求，避免违规进口或出口危险废物和其他废物

三、参考依据

我们遵守人权标准，包括以下公约：

- 《第 29 号公约》即（强迫劳动公约（第 29 号））
- 《强迫劳动公约议定书》
- 《第 87 号公约》即（结社自由和保护组织权公约）
- 《第 98 号公约》即（组织权和集体谈判权公约）
- 《第 100 号公约》即（1951 年国际劳工组织同酬公约）
- 《第 105 号公约》即（废除强迫劳动力公约）
- 《第 111 号公约》即（1958 年国际劳工组织歧视（就业和职业）公约）
- 《第 138 号公约》即（1973 年国际劳工组织最低年龄公约）
- 《第 182 号公约》即（关于禁止和立即行动消除最有害的童工形式公约）
- 《公民及政治权利国际盟约》
- 《经济社会文化权利国际盟约》
- 《水俣公约》
- 《斯德哥尔摩公约》
- 《巴塞尔公约》

四、员工行为倡议

作为 CATL 德国公司的一员，我们号召各位同事一起行动以确保我们在开展业务过程中始终按照 LkSG 要求做到尊重人权和保护环境，具体包括：

- 禁止使用童工和保护青年工人
- 禁止强迫劳动和现代奴役
- 重视工作场所的健康和安全
- 尊重结社自由和集体谈判权
- 避免就业方面的不平等待遇

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- 禁止扣留至少相当于最低工资的公平工资
 - 保护当地社区和土著居民
 - 保护土地权和禁止强迫驱逐
 - 避免雇佣私人或公共安全部队或在没有充分监督的情况下使用安全部队，而由此可能导致侵犯 LkSG 所保护的人权
 - 避免造成有害土壤变化、水污染、空气污染、有害噪声排放或者过量用水等行为
 - 遵守《水俣公约》要求，避免违规生产和使用受汞污染的产品或非法处理汞废物
 - 遵守《斯德哥尔摩公约》要求，避免违规生产、使用、储存和处置持久性有机物质
 - 遵守《巴塞尔公约》要求，避免违规进口或出口危险废物和其他废物

上述倡议概述了 CATL 德国公司根据 LkSG 必须遵守的法律要求，这影响了 CATL 德国公司自身业务领域内所有 CATL 德国公司员工在与业务伙伴、官员和第三方互动时的行为，强调了尊重人权和环境保护的重要性。

五、风险管理机制

我们遵循法律法规的规定，以负责任的态度识别并管理与人权及环境相关的风险，并积极地进行风险管理。基于当前的风险管理状况，我们逐步确立了降低风险影响的具体目标，并持续地监督和优化我们的策略，以确保有效地降低风险，并持续地关注风险管理的进展。

结合公司业务特性、内外部发展环境以及专家建议，我们识别了与 LkSG 相关的潜在人权与环境风险及机遇，并采取了积极的应对措施。

我们构建了一套风险管理体系，涵盖风险分析、预防措施、补救措施、申诉机制、文档保存及报告披露、合规性评估等多个方面。此外，我们每年都会根据有效性评估的结果，对上述风险管理体系进行持续的完善与优化。

我们的管理层定期及不定期地审视现行法律法规，确保符合 LkSG 规定，并采取适当的风险管理措施。同时，他们明确指定各项行动的责任人，并制定详尽的完成时间表，以保障问责制和行动的有效性。

依据 LkSG 规定，我们已设立人权官职位，负责监督风险管理的有效实施，并定期（至少每年一次）向 CATL 德国公司管理层报告关于人权和环境风险事项以及尽职调查工作的执行情况，以确保风险管理机制的适当性和合规性。

5.1 风险分析

根据 LkSG 要求，我们构建了一套系统化的风险识别与评估框架，该框架详细阐述了具体的风险分析流程。在履行尽职调查职责的过程中，我们特别关注 LkSG 提到的潜在风险。我们依据违规

行为的预期严重性及其发生的可能性等标准,系统地识别和评估相关人权议题和可能受影响的人群并对识别到的风险进行优先级排序。

上述风险分析每年定期执行,但亦根据实际情况调整。例如,在国家风险出现变动时,或是收到申诉机制的报告、官方及非政府组织的公开报告时,均会进行相应的风险分析。

作为风险分析的一部分,针对我们**自身经营领域**,我们检查在我们所在地被视为重要的人权相关议题。在负责任且具有适当资格的员工(风险评估员)的参与下,针对每个确定的受影响群体确定具体的人权相关风险。风险分析的结果将形成一项措施计划,并定期测试其实施情况和有效性。

对于我们的**供应链**,我们根据采购或服务类别识别风险,并考虑供应商已实施的尊重人权的措施和流程。我们系统地扩展了我们的企业风险和供应商管理,包括尊重人权的流程和措施。从而,我们确定了直接供应商的风险状况。我们特别关注那些采购量大且在过去三年内持续与 CATL 德国公司保持业务往来的供应商。

另外,若我们获得有关间接供应商潜在风险事件的确切信息,或者我们推出新产品、新项目或进入新业务领域时,我们亦将执行相应的临时风险分析。

5.2 预防措施

根据风险分析的结果,我们将以下风险确定为我们优先关注的人权和环境相关风险,包括:

- 忽视职业健康和安全
- 忽视结社自由和集体谈判权
- 造成有害土壤变化、水污染、空气污染、有害噪声排放或者过量用水等行为,导致严重损害食品保存和生产的自然基础、无法获得清洁和安全的饮用水、损毁卫生设施以致无法使用和危害人体健康等情形

我们对自身经营领域及供应链中的人权和环境风险进行了评估,并通过与各业务部门的沟通等手段对这些风险进行了深入分析,制定了相应的风险预防措施,包括:

对于**自身经营领域**,我们已正式发布符合 LkSG 的《LkSG 员工行为指南》,该指南详细阐述了 LkSG 在人权和环境领域所遵循的人权原则,旨在确保 CATL 德国在其业务范围内建立统一的人权风险管理标准得到充分满足。它是 LkSG 下预防人权和环境风险的关键措施之一,并概括了 CATL 德国公司在 LkSG 框架下必须遵守的法律要求。该文件已在公司内部经过审议,并已分发给所有员工以供执行。我们积极鼓励员工通过各种渠道报告风险事件。此外,我们正在为员工规划培训资源,以增强员工的风险管理意识(规划中)。

针对**供应链**,我们已制定《供应商行为准则》(CSCC),并通过供应商关系管理系统的登录页面面向直接供应商进行了传达。我们致力于构建并维护一个负责任的供应链,并向供应商承诺,将严格遵守 LkSG 要求,避免在业务操作中出现侵犯人权的行为。

我们期望所有供应商均能遵循 LkSG 供应商行为准则。该准则详细阐述了 LkSG 所要求的人权和环境原则，旨在帮助供应链中的所有供应商在人权和环境风险管理标准上达成共识。此外，我们正在拟定一项计划，将在与供应商签订的合同协议中签署 CSCC，确保将上述政策传达给商业伙伴。我们期望激励供应商积极承担尊重人权的责任。

5.3 补救措施

一旦我们察觉到自身业务运营领域或直接、间接供应商即将违反或已经违反 LkSG 要求，我们将迅速采取必要的补救措施。这些措施包括但不限于对自身运营领域的整改，与受影响供应商进行沟通 and 协商，以及在必要时减少甚至终止合作，以防止、最大限度地减少或消除违规行为。

5.4 申诉程序

为符合 LkSG 要求，我们提供电子邮件和纸质信件的举报方式，24 小时接收社会公众、员工、合作伙伴、客户、供应商等利益相关方对疑似违反 LkSG 要求行为的投诉或者举报。我们通过内部制度发布、公告栏等方式传达给全体员工。我们严格遵守投诉人保护规定，通过实施标准化保护机制保护投诉人的权利。我们实施保密管理措施保护投诉人的权利，包括限制信息访问渠道、指定专人处理投诉案件。您可以通过官方网站 (www.catl.com/de) 的“申诉程序规则”获取有关投诉机制的更多详细信息。

5.5 文档和报告

依据 LkSG 要求，我们会从 2025 年开始，向德国联邦经济和出口管制局（“BAFA”）提交年度报告，报告中列示我们已实施的风险管理机制、预防和补救措施、申诉机制以及我们评估上述机制或措施的有效性的方法，以及我们已发现重大的人权领域和环境领域涉及人权的风险(如有)，以及其对自身经营业务领域和供应链领域产生的人权、环境风险影响（如有）。我们网站 (www.catl.com/de) 也会发布和披露此年度报告。

5.6 有效性效果评估

根据 LkSG 要求，以风险为导向，对我们的预防措施、补救措施及申诉机制的运行情况（包括我们自身经营领域的人权、环境风险管理机制、供应链领域的人权、环境风险管理机制）的充分性、有效性和及时性进行合规评估，以确保我们的风险管理的恰当性及有效性。